

**EXHIBIT B**  
**TO ADVANCEME'S SUR-REPLY IN OPPOSITION**  
**TO DEFENDANTS' MOTION TO COMPEL**

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**Via E-mail**

Willem G. Schuurman, Esq.  
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Re: *AdvanceMe v. RapidPay, et al.*  
*AdvanceMe v. Amerimerchant*  
**The 30(b)(6) Deposition of AdvanceMe in Atlanta, Georgia**

Dear Mr. Schuurman:

We write to confirm that AdvanceMe, Inc. will, on Friday, December 8, 2006 at 9:00 a.m. at 210 Peachtree Street, Atlanta, Georgia 30303, produce a witness to testify as to Topics 1-3, 7, and 16-21, as these topics were limited during the meet and confer process. As for the remaining topics set forth in Defendants' 30(b)(6) Notice, AdvanceMe will await and comply with Judge Love's order in this regard.

AdvanceMe reserves the right to move for a protective order in the event Defendants seek an additional seven hours of 30(b)(6) deposition testimony from AdvanceMe, as they have suggested they will in previous correspondence.

Sincerely,

  
Robert C. Matz

cc: Hilary L. Preston, Esq.  
Joseph D. Gray, Esq.  
Douglas R. McSwane, Jr., Esq.

RCM/rjs